

**JOSH M. REID**

City Attorney  
Nevada Bar No. 7497

**NANCY D. SAVAGE**

Assistant City Attorney  
Nevada Bar No. 392

**BRIAN R. REEVE**

Assistant City Attorney  
Nevada Bar No. 10197  
240 Water Street, MSC 144  
Henderson, NV 89015

(702) 267-1231

(702) 267-1201 Facsimile

[Nancy.Savage@cityofhenderson.com](mailto:Nancy.Savage@cityofhenderson.com)

[Brian.Reeve@cityofhenderson.com](mailto:Brian.Reeve@cityofhenderson.com)

Attorneys for Defendants

*City of Henderson, Henderson Police Chief Patrick Moers,  
Detective Mark Hosaka and Detective Chad Mitchell*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

VANESSA KELLEY,

Plaintiff,

v.

CITY OF HENDERSON, a political subdivision of the State of Nevada and the County of Clark; LAS VEGAS METROPOLITAN POLICE DEPARTMENT, a political subdivision of the State of Nevada and the County of Clark d/b/a/ CLARK COUNTY DETENTION CENTER; HENDERSON POLICE CHIEF PATRICK MOERS, in his individual capacity; LVMPD SHERIFF DOUGLAS GILLESPIE, in his individual capacity; DETECTIVE MARK HOSAKA, in his individual capacity as an officer employed by the City of Henderson; DETECTIVE CHAD MITCHELL, in his individual capacity as an officer employed by the City of Henderson; NAPHCARE, medical care provider for the Clark County Detention Center; CORIZON CORRECTIONAL HEALTHCARE, a medical care provider for the Henderson Jail; DOE DEFENDANTS I-

CASE NO.: 2:15-CV-02204-APG-VCF

**STIPULATION AND ORDER TO  
EXTEND TIME FOR DEFENDANTS TO  
REPLY TO PLAINTIFF'S OPPOSITION  
TO THE HENDERSON DEFENDANTS'  
MOTION TO DISMISS (Second Request)**



X, individually; DOES HENDERSON  
POLICE OFFICERS I-X, individually as  
officers employed by the City of Henderson;  
DOE LVMPD POLICE OFFICERS I-X,  
individually as officers employed by LVMPD;  
and ROE ENTITIES I-X, inclusive,

Defendants.

**STIPULATION AND ORDER TO EXTEND TIME FOR DEFENDANTS TO REPLY TO  
PLAINTIFF'S OPPOSITION TO THE HENDERSON DEFENDANTS'  
MOTION TO DISMISS (Second Request)**

COME NOW Plaintiff Vanessa Kelley and Defendants City of Henderson,  
Henderson Police Chief Patrick Moers, Detective Mark Hosaka and Detective Chad  
Mitchell (collectively referred to as "Henderson Defendants"), by and through their  
respective counsel of record, pursuant to LR 6-1, and hereby stipulate, agree and make  
joint application to extend the time for the Henderson Defendants to file their Reply(ies) to  
Plaintiff's Opposition (Doc. 31) to the Henderson Defendants' Motion to Dismiss (Doc. 17).  
The time to file such Reply(ies) to the Plaintiff's Opposition to the Motion to Dismiss (Doc.  
17) are currently due on Thursday, February 11, 2016 pursuant to the Stipulation and  
Order entered on the First Request for Extension. (Doc. 36)

The stipulating parties respectfully request a seven (7) day extension up to and  
including Thursday, February 18, 2016, for the Henderson Defendants' above-referenced  
to file their Reply(ies).

The stipulating parties submit that good cause exists for this extension. Counsel  
inadvertently included Thursday February 11, as the due date in the First Request, instead  
of Thursday, February 18, 2016 based upon the Henderson Defendants' counsel's  
schedule between the date of filing of the Plaintiff's Opposition to the Motion to Dismiss  
(Doc. 31) and the requested date. As a result an extension up to and including February  
18, 2016 is sought in this request in order to provide for adequate time for counsel to be  
able to reasonably prepare a complete an appropriately supported Reply(ies) on behalf of  
the Henderson Defendants and each of them.

Based upon the foregoing, the parties respectfully request that this Court enter its order extending the time for the Henderson Defendants to file their Reply(ies) to Plaintiff's Opposition to the Henderson Defendants' Motion to Dismiss (Doc. 31), up to and including Thursday, February 18, 2016.

This is the second request for enlargement of time for the Henderson Defendants to file their Reply(ies) to Plaintiff's Opposition to the Motion to Dismiss and it is made in good faith and not for the purposes of delay.

POTTER LAW OFFICES

CITY OF HENDERSON  
JOSH M. REID, City Attorney

/s/ Cal J. Potter

CAL J. POTTER, III, ESQ.  
Nevada Bar No. 1988  
CAL J. POTTER, IV, ESQ.  
Nevada Bar No. 13225  
1125 Shadow Lane  
Las Vegas, Nevada 89102  
Attorneys for Plaintiff

/s/ Nancy D. Savage

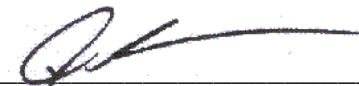
JOSH M. REID, ESQ.  
City Attorney  
Nevada Bar No. 7497  
NANCY D. SAVAGE, ESQ.  
Assistant City Attorney  
Nevada Bar No. 392  
240 Water Street, MSC 144  
Henderson, Nevada 89009  
Attorney for Henderson Defendants

DATED: February 8, 2016

DATED: February 8, 2016

**ORDER**

IT IS SO ORDERED this 9th day of February, 2016.



UNITED STATES DISTRICT JUDGE